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Attorneys for Secured Creditor,  
U.S. Bank Trust National Association, as Trustee of Dwelling Series IV Trust

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY - CAMDEN DIVISION**

In Re:	)	Case No.: 18-25358-JNP
	)	
Osiris E. Padilla,	)	Chapter 13
	)	
Debtor.	)	<b>NOTICE OF APPEARANCE</b>
	)	<b>AND REQUEST FOR SERVICE</b>
	)	

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**TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR, AND ALL  
INTERESTED PARTIES**

**PLEASE TAKE NOTICE** that GHIDOTTI | BERGER, LLP, attorneys for Secured Creditor, U.S. Bank Trust National Association, as Trustee of Dwelling Series IV Trust (“**Secured Creditor**”), hereby files its notice of appearance and requests notice of all events relevant to the above referenced bankruptcy and copies of all pleadings or documents filed in relation to the above referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be noticed to creditors, creditors’ committees and parties-in-interest and other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy court.

GHIDOTTI | BERGER, LLP, requests that for all notice purposes and for inclusion in the Master Mailing List in this case, the following address be used:

David Coats, Esq.

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Neither this Notice of Appearance and Request for Notice nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party's:

a. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;

b. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;

c. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved by this party without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: July 17, 2023

GHIDOTTI | BERGER, LLP

By: /s/ David Coats  
David Coats, Esq.  
Attorney for Secured Creditor

**CERTIFICATE OF SERVICE**

On July 17, 2023, I served the foregoing document described as **NOTICE OF APPEARANCE AND REQUEST FOR SERVICE** on the following individuals. By electronic means through the Court's ECF program:

COUNSEL FOR DEBTOR: Jeanie D. Wiesner - [jeanie@sadeklaw.com](mailto:jeanie@sadeklaw.com)

CHAPTER 13 TRUSTEE: Isabel C. Balboa - [ecfmail@standingtrustee.com](mailto:ecfmail@standingtrustee.com),  
[summarymail@standingtrustee.com](mailto:summarymail@standingtrustee.com)

US TRUSTEE: [USTPRegion03.NE.ECF@usdoj.gov](mailto:USTPRegion03.NE.ECF@usdoj.gov)

By depositing true copies thereof in the United States mail at Santa Ana, California enclosed in a sealed envelope, with postage paid, addressed as follows:

DEBTOR:  
Osiris E. Padilla  
21 Charles Ave  
Pleasantville, NJ 08232-2503

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/Cheri Brewer